



**Service of Process  
Transmittal**

05/06/2019

CT Log Number 535422385

**TO:** Tricia Davini, Tax Manager  
Stockbridge Capital Group, LLC  
4 Embarcadero Ctr Ste 3300  
San Francisco, CA 94111-4184

**RE: Process Served in South Carolina**

**FOR:** SCG PATRIOTS PLAZA, LP (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** GREGORY LASKY, Pltf. vs. SCO PATROITS PLAZA L.P., Dft.

**DOCUMENT(S) SERVED:** SUMMONS, COMPLAINT(S), COVER SHEET(S)

**COURT/AGENCY:** Charleston County Court of Common Pleas, SC  
Case # 2019CP101565

**NATURE OF ACTION:** Complaint for Violation of Federal Law Title III of the Americans with Disabilities Act, 42 U.S.C. 12101, Et Seq.

**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Columbia, SC

**DATE AND HOUR OF SERVICE:** By Process Server on 05/06/2019 at 08:15

**JURISDICTION SERVED :** South Carolina

**APPEARANCE OR ANSWER DUE:** Within 30 Days After Service Hereof, Exclusive of the Day of Such Service

**ATTORNEY(S) / SENDER(S):** Anthony J. Brady, Jr.  
Law Office of Anthony Brady, Jr.  
1670-9 Springdale Drive  
PMB 159.  
Camden, SC 29020  
561-603-8387

**REMARKS:** (Underlined) The documents received have been modified to reflect the name of the entity being served.

**ACTION ITEMS:** SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780131058375  
Image SOP

**SIGNED:** CT Corporation System  
**ADDRESS:** 2 Office Park Court  
Suite 103  
Columbia, SC 29223  
**TELEPHONE:** 302-658-7581

STATE OF SOUTH CAROLINA

THE COURT OF COMMON  
PLEAS

COUNTY OF CHARLESTON

9<sup>TH</sup> JUDICIAL CIRCUIT2019-CP-10-1565

GREGORY LASKY

Plaintiff,

vs.

SCG PATROITS PLAZA L.P.

Defendant(s).

FILE NO.

SUMMONS

2019 MAR 27 AM 10:13  
JULIE J. CHRISTIANO  
CLERK OF COURT  
BY

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Camden, South Carolina.

Dated: March 17, 2019.

S/Anthony Brady

Plaintiff/Attorney for Plaintiff

Address:

Anthony J. Brady Jr.  
1670-9 Springdale Drive  
PMB 159  
Camden, South Carolina 29020  
561-603-8387  
Email: Ladbrady@gmail.com  
Attorney ID: 15506

RCSD

MAY -2 PM 2:52

RECEIVED

STATE OF SOUTH CAROLINA

THE COURT OF COMMON  
PLEAS

COUNTY OF CHARLESTON

9<sup>TH</sup> JUDICIAL CIRCUIT

2019-CP-10-1565

2019 MAR 27 AM 10:13  
JULIE M. HARRIS  
CLERK OF COURT

GREGORY LASKY

CASE NO.

Plaintiff,

Civil Action

vs.

SCG PATROITS PLAZA L.P.

COMPLAINT

Defendant(s).

Plaintiff, residing at 20 South Main Street ,Glassboro, New Jersey by way of complaint against the Defendant states:

1. This Honorable Court has jurisdiction in that it is a Court of general jurisdiction and the Plaintiff has alleged a violation of federal law Title III of the Americans with Disabilities Act, 42 U.S.C. § 12101, et seq. Plaintiffs' claim is greater than \$15,000.00 and venue is proper in Charleston County because the cause of action arose in Charleston County and that Defendant resides in Charleston County.

### PARTIES

2. Plaintiff, resides at 20 South Main Street St Glassboro New Jersey who used to reside in South Carolina. He is a disabled man because of a medical mishap becoming has partial Tetraplegia. As a result he cannot walk and uses a wheelchair. He qualifies as an individual with disabilities as defined by the federal Americans with Disabilities Act (ADA).

3. The defendants own, lease, leases to, or operates a place of public accommodation as defined by the ADA. The property that is the subject of this suit is a shopping mall commonly called

Patriots Plaza, located a 845 Houston Northcutt Mt. Pleasant, Charleston County, South Carolina.

### **STATEMENT OF THE CASE.**

This suit is a private action brought by a Plaintiff, who uses a wheelchair as a result of being a quadriplegic, for injunctive relief under the federal American with Disabilities Act, 42 USC 12182.

It would be wise to review the purposes of the access laws. First, the laws are about opportunity, as former Speaker of the House Gingrich has stated, "Mr. Chairman, throughout our history, our disabled citizens have not been provided the opportunity to participate in all phases of society. Designed to provide 43,000,000 Americans with enhanced opportunities, this bill, then, embodies the conservative idea of opportunity." 136 Cong. Rec. H2631 (daily ed. May 22, 1990) (Statement of Rep. Gingrich).

Second, the law is about the economic wellbeing of America. As former Attorney General Thornburgh testified, "We must recognize that passing comprehensive civil rights legislation protecting persons with disabilities will have direct and tangible benefits for our country. Certainly,...the mainstreaming of persons with disabilities will result...in more persons with disabilities working, in increasing earnings, in less dependence on the Social Security System for financial support, in increased spending on consumer goods, and increased tax revenues." Testimony before House Committee on Civil and Constitutional Rights, Ser No. 101-58, Oct. 11, 1989, p. 811.

Third, the law is to end segregation. As Senator Kennedy stated, "The Americans With Disabilities Act will end this American apartheid. It will roll back the unthinking and unacceptable practices by which disabled Americans today are segregated, excluded, and fenced off from fair participation in our society by mindless biased attitudes and senseless physical barriers. 35 Cong. Rec. 54993 (daily ed. May 09, 1989) (Statement of Sen. Kennedy).

It is, respectfully, submitted that Senator Dole's opinion that the access laws are about dignity,

“Living independently and with dignity means opportunity to participate fully in every activity of daily life” 136 Cong. Rec. S9695 (daily ed. July 13, 1990) (Statement of Sen. Dole).

Plaintiffs seek an award of injunctive relief attorney fees and costs as a private attorney general. The Courts have explained the role of private enforcement of the access laws. The 9<sup>th</sup> Circuit explained, “For the ADA to yield its promise of equal access for the disabled it may be indeed necessary and desirable for committed individuals to bring serial litigation advocating the time when public accommodations will be compliant with the ADA”, D’Lil v. Best Western Encino-Lodge & Suites, 538 F.3d 1031 (9<sup>th</sup> Cir. 2008).

In Walker v. Guiffre, 200 N.J. 124, 156 (2012) in awarding an enhancement in a state case held, “Her obligation served not her sole interests, but the interests of any and all who had been or who might otherwise in the future have been denied access to the premises. The relief sought, both because it was equitable in nature and because it was designed to serve a broad social purpose weighs in favor of a continuous enhancement at the highest end of the spectrum.”

#### FIRST COUNT.

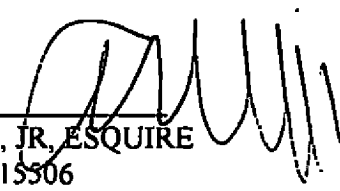
4. Plaintiff is a frequent traveler to Charleston, South Carolina because
5. On numerous occasions including September 12, 2018 Lasky was a guest at Defendants’ Shopping Mall.
6. His ability to use the services of the shopping mall was impaired because of lack of proper Access to him and the disabled as a whole.
7. Specially, the shopping mall parking does not provide proper parking for the disabled in that it is on acute slopes has lack of proper signage not enough spaces. In that Lasky is a wheelchair user it is more difficult for him to travel from point A to B, therefore, he has been discriminated against under the ADA.

11. The above violations are violations of the federal ADA Title III.
12. The discriminatory violations described above are not an exclusive list of the defendants' accessibility problems/violations. Plaintiff requires an inspection to identify all barriers.
14. The plaintiff intends to be a frequent patron of defendants, when it complies with the ADA. He will also return as a tester.
15. Plaintiff seeks equitable relief in that to create access is readily achievable if the above violations are pre-existing construction.
16. Plaintiff reserves the right to file administrative remedies for damages under South Carolina law.

Wherefore, plaintiff Lasky seeks:

- a) Injunctive relief under the ADA.
- b) Attorney fees and costs of suit under the ADA.

Date: March 17, 2019.

By:   
s/Anthony J. Brady, Jr.  
ANTHONY J. BRADY, JR., ESQUIRE  
South Carolina Bar No. 15506  
Law Office of Anthony Brady, Jr.  
1670-9 Springdale Drive  
PMB 159.  
Camden, South Carolina 29020  
Email: ladbrady@gmail.com  
5616036387

STATE OF SOUTH CAROLINA

COUNTY OF Charleston

IN THE COURT OF COMMON PLEAS

Plaintiff(s)

vs.

Defendant(s)

Submitted By: Anthony 3 Brady Sr  
 Address: 1672 - 91 Spring St Dr  
Camden, SC 29020

CIVIL ACTION COVERSHEET

2019-CP-101506

SC Bar #: 15506Telephone #: 861-683-6387

Fax #:

Other:

E-mail: L40Arady@smc.net

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- ☐ JURY TRIAL demanded in complaint. ☒ NON-JURY TRIAL demanded in complaint.  
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☒ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

- |   |  |   |  |
|---|--|---|--|
| <b>Contracts</b><br><input type="checkbox"/> Constructions (100)<br><input type="checkbox"/> Debt Collection (110)<br><input type="checkbox"/> General (130)<br><input type="checkbox"/> Breach of Contract (140)<br><input type="checkbox"/> Fraud/Bad Faith (150)<br><input type="checkbox"/> Failure to Deliver/Warranty (160)<br><input type="checkbox"/> Employment Discrim (170)<br><input type="checkbox"/> Employment (180)<br><input type="checkbox"/> Other (199)<br><b>Inmate Petitions</b><br><input type="checkbox"/> PCR (500)<br><input type="checkbox"/> Mandamus (520)<br><input type="checkbox"/> Habeas Corpus (530)<br><input type="checkbox"/> Other (599) | <b>Torts - Professional Malpractice</b><br><input type="checkbox"/> Dental Malpractice (200)<br><input type="checkbox"/> Legal Malpractice (210)<br><input type="checkbox"/> Medical Malpractice (220)<br>Previous Notice of Intent Case #<br>20 -NI-<br><input type="checkbox"/> Notice/ File Med Mal (230)<br><input type="checkbox"/> Other (299)<br><b>Administrative Law/Relief</b><br><input type="checkbox"/> Reinstate Drv. License (800)<br><input type="checkbox"/> Judicial Review (810)<br><input type="checkbox"/> Relief (820)<br><input type="checkbox"/> Permanent Injunction (830)<br><input type="checkbox"/> Forfeiture-Petition (840)<br><input type="checkbox"/> Forfeiture-Consent Order (850)<br><input type="checkbox"/> Other (899) | <b>Torts - Personal Injury</b><br><input type="checkbox"/> Conversion (310)<br><input type="checkbox"/> Motor Vehicle Accident (320)<br><input type="checkbox"/> Premises Liability (330)<br><input type="checkbox"/> Products Liability (340)<br><input type="checkbox"/> Personal Injury (350)<br><input type="checkbox"/> Wrongful Death (360)<br><input type="checkbox"/> Assault/Battery (370)<br><input type="checkbox"/> Slander/Libel (380)<br><input type="checkbox"/> Other (399)<br><b>Judgments/Settlements</b><br><input type="checkbox"/> Death Settlement (700)<br><input type="checkbox"/> Foreign Judgment (710)<br><input type="checkbox"/> Magistrate's Judgment (720)<br><input type="checkbox"/> Minor Settlement (730)<br><input type="checkbox"/> Transcript Judgment (740)<br><input type="checkbox"/> Lis Pendens (750)<br><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)<br><input type="checkbox"/> Confession of Judgment (770)<br><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)<br><input type="checkbox"/> Incapacitated Adult Settlement (790)<br><input type="checkbox"/> Other (799) | <b>Real Property</b><br><input type="checkbox"/> Claim & Delivery (400)<br><input type="checkbox"/> Condemnation (410)<br><input type="checkbox"/> Foreclosure (420)<br><input type="checkbox"/> Mechanic's Lien (430)<br><input type="checkbox"/> Partition (440)<br><input type="checkbox"/> Possession (450)<br><input checked="" type="checkbox"/> Building Code Violation (460)<br><input type="checkbox"/> Other (499)<br><b>Appeals</b><br><input type="checkbox"/> Arbitration (900)<br><input type="checkbox"/> Magistrate-Civil (910)<br><input type="checkbox"/> Magistrate-Criminal (920)<br><input type="checkbox"/> Municipal (930)<br><input type="checkbox"/> Probate Court (940)<br><input type="checkbox"/> SCDOT (950)<br><input type="checkbox"/> Worker's Comp (960)<br><input type="checkbox"/> Zoning Board (970)<br><input type="checkbox"/> Public Service Comm. (990)<br><input type="checkbox"/> Employment Security Comm (991)<br><input type="checkbox"/> Other (999) |
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- Special/Complex /Other**  
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☐ Sexual Predator (510) ☐ Pre-Suit Discovery (670)  
☐ Permanent Restraining Order (680)  
☐ Interpleader (690)
- Submitting Party Signature: [Signature] Date: 3/21/19

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STATE OF SOUTH CAROLINA

)  
)THE COURT OF COMMON  
PLEAS

COUNTY OF CHARLESTON

)  
)9<sup>TH</sup> JUDICIAL CIRCUIT2019-CP-10-1565

GREGORY LASKY

)  
)

Plaintiff,

vs.

)  
)

FILE NO.

SCG PATROITS PLAZA L.P.

)  
)

SUMMONS

Defendant(s).

)  
)

2019 MAR 27 AM 10:13  
JULIE J. BRADY  
CLERK OF COURT  
BY \_\_\_\_\_

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Camden, South Carolina.

Dated: March 17, 2019.

S/Anthony Brady

Plaintiff/Attorney for Plaintiff

Address:

Anthony J. Brady Jr.  
1670-9 Springdale Drive  
PMB 159  
Camden, South Carolina 29020  
561-603-8387  
Email: Ladbrady@gmail.com  
Attorney ID. 15506



STATE OF SOUTH CAROLINA

**THE COURT OF COMMON  
PLEAS**

**COUNTY OF CHARLESTON**

**9<sup>TH</sup> JUDICIAL CIRCUIT**

2019-CP-10-1565

2019 MAR 27 AM 10:13

SECRET

**GREGORY LASKY**

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**Plaintiff,**

### Civil Action

**vs.**

**SCG PATROITS PLAZA L.P**

## COMPLAINT

**Defendant(s).**

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Defendant states:

1. This Honorable Court has jurisdiction in that it is a Court of general jurisdiction and the Plaintiff has alleged a violation of federal law Title III of the Americans with Disabilities Act, 42 U.S.C. § 12101, et seq. Plaintiffs' claim is greater than \$15,000.00 and venue is proper in Charleston County because the cause of action arose in Charleston County and that Defendant resides in Charleston County.

## PARTIES

2. Plaintiff, resides at 20 South Main Street St Glassboro New Jersey who used to reside in South Carolina. He is a disabled man because of a medical mishap becoming has partial Tetraplegia. As a result he cannot walk and uses a wheelchair. He qualifies as an individual with disabilities as defined by the federal Americans with Disabilities Act (ADA).

3. The defendants own, lease, leases to, or operates a place of public accommodation as defined by the ADA. The property that is the subject of this suit is a shopping mall commonly called

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### **STATEMENT OF THE CASE.**

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#### FIRST COUNT.

4. Plaintiff is a frequent traveler to Charleston, South Carolina because
5. On numerous occasions including September 12, 2018 Lasky was a guest at Defendants' Shopping Mall.
6. His ability to use the services of the shopping mall was impaired because of lack of proper Access to him and the disabled as a whole.
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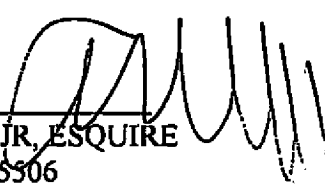
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16. Plaintiff reserves the right to file administrative remedies for damages under South Carolina law.

Wherefore, plaintiff Lasky seeks:

- a) Injunctive relief under the ADA.
- b) Attorney fees and costs of suit under the ADA.

Date: March 17, 2019.

By: s/Anthony J. Brady, Jr.  
ANTHONY J. BRADY, JR., ESQUIRE  
South Carolina Bar No. 15506  
Law Office of Anthony Brady, Jr.  
1670-9 Springdale Drive  
PMB 159.  
Camden, South Carolina 29020  
Email: ladbrady@gmail.com  
5616036387



STATE OF SOUTH CAROLINA

COUNTY OF

Charleston

IN THE COURT OF COMMON PLEAS

Plaintiff(s)

vs.

Defendant(s)

Submitted By:

Address:

PMB 939

Camden, SC 29020

CIVIL ACTION COVERSHEET

2019-CP-1015506

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

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☐ Interpleader (690)
- Submitting Party Signature: \_\_\_\_\_ Date: 3/21/19

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 ) PLEAS

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GREGORY LASKY )

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vs. )

SCG PATROITS PLAZA L.P. )

Defendant(s). )

FILE NO.

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2019 MAR 27 AM 10:13  
JULIE J. HANSTON  
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Camden, South Carolina.

Dated: March 17, 2019.

S/Anthony Brady

Plaintiff/Attorney for Plaintiff

Address:

Anthony J. Brady Jr.  
1670-9 Springdale Drive  
PMB 159  
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Email: Ladbrady@gmail.com  
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Defendant(s).

Plaintiff, residing at 20 South Main Street ,Glassboro, New Jersey by way of complaint against the Defendant states:

1. This Honorable Court has jurisdiction in that it is a Court of general jurisdiction and the Plaintiff has alleged a violation of federal law Title III of the Americans with Disabilities Act, 42 U.S.C. § 12101, et seq. Plaintiffs' claim is greater than \$15,000.00 and venue is proper in Charleston County because the cause of action arose in Charleston County and that Defendant resides in Charleston County.

#### PARTIES

2. Plaintiff, resides at 20 South Main Street St Glassboro New Jersey who used to reside in South Carolina. He is a disabled man because of a medical mishap becoming has partial Tetraplegia. As a result he cannot walk and uses a wheelchair. He qualifies as an individual with disabilities as defined by the federal Americans with Disabilities Act (ADA).

3. The defendants own, lease, leases to, or operates a place of public accommodation as defined by the ADA. The property that is the subject of this suit is a shopping mall commonly called

Patriots Plaza, located a 845 Houston Northcutt Mt. Pleasant, Charleston County, South Carolina.

### **STATEMENT OF THE CASE.**

This suit is a private action brought by a Plaintiff, who uses a wheelchair as a result of being a quadriplegic, for injunctive relief under the federal American with Disabilities Act, 42 USC 12182.

It would be wise to review the purposes of the access laws. First, the laws are about opportunity; as former Speaker of the House Gingrich has stated, "Mr. Chairman, throughout our history, our disabled citizens have not been provided the opportunity to participate in all phases of society. Designed to provide 43,000,000 Americans with enhanced opportunities, this bill, then, embodies the conservative idea of opportunity." 136 Cong. Rec. H2631 (daily ed. May 22, 1990) (Statement of Rep. Gingrich).

Second, the law is about the economic wellbeing of America. As former Attorney General Thornburgh testified, "We must recognize that passing comprehensive civil rights legislation protecting persons with disabilities will have direct and tangible benefits for our country. Certainly,...the mainstreaming of persons with disabilities will result...in more persons with disabilities working, in increasing earnings, in less dependence on the Social Security System for financial support, in increased spending on consumer goods, and increased tax revenues." Testimony before House Committee on Civil and Constitutional Rights, Ser No. 101-58, Oct. 11, 1989, p. 811.

Third, the law is to end segregation. As Senator Kennedy stated, "The Americans With Disabilities Act will end this American apartheid. It will roll back the unthinking and unacceptable practices by which disabled Americans today are segregated, excluded, and fenced off from fair participation in our society by mindless biased attitudes and senseless physical barriers. 35 Cong. Rec. 54993 (daily ed. May 09, 1989) (Statement of Sen. Kennedy).

It is, respectfully, submitted that Senator Dole's opinion that the access laws are about dignity,



"Living independently and with dignity means opportunity to participate fully in every activity of daily life" 136 Cong. Rec. S9695 (daily ed. July 13, 1990) (Statement of Sen. Dole).

Plaintiffs seek an award of injunctive relief attorney fees and costs as a private attorney general. The Courts have explained the role of private enforcement of the access laws. The 9<sup>th</sup> Circuit explained, "For the ADA to yield its promise of equal access for the disabled it may be indeed necessary and desirable for committed individuals to bring serial litigation advocating the time when public accommodations will be compliant with the ADA", D'Lil v. Best Western Encino-Lodge & Suites, 538 F.3d 1031 (9<sup>th</sup> Cir. 2008).

In Walker v. Guiffre, 200 N.J. 124, 156 (2012) in awarding an enhancement in a state case held, "Her obligation served not her sole interests, but the interests of any and all who had been or who might otherwise in the future have been denied access to the premises. The relief sought, both, because it was equitable in nature and because it was designed to serve a broad social purpose weighs in favor of a continuous enhancement at the highest end of the spectrum."

#### FIRST COUNT.

4. Plaintiff is a frequent traveler to Charleston, South Carolina because
5. On numerous occasions including September 12, 2018 Lasky was a guest at Defendants' Shopping Mall.
6. His ability to use the services of the shopping mall was impaired because of lack of proper Access to him and the disabled as a whole.
7. Specially, the shopping mall parking does not provide proper parking for the disabled in that it is on acute slopes has lack of proper signage not enough spaces. In that Lasky is a wheelchair user it is more difficult for him to travel from point A to B, therefore, he has been discriminated against under the ADA.

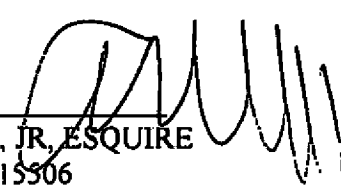
11. The above violations are violations of the federal ADA Title III.
12. The discriminatory violations described above are not an exclusive list of the defendants' accessibility problems/violations. Plaintiff requires an inspection to identify all barriers.
14. The plaintiff intends to be a frequent patron of defendants, when it complies with the ADA. He will also return as a tester.
15. Plaintiff seeks equitable relief in that to create access is readily achievable if the above violations are pre-existing construction.
16. Plaintiff reserves the right to file administrative remedies for damages under South Carolina law.

Wherefore, plaintiff Lasky seeks:

- a) Injunctive relief under the ADA.
- b) Attorney fees and costs of suit under the ADA.

Date: March 17, 2019.

By: s/Anthony J. Brady, Jr.  
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## STATE OF SOUTH CAROLINA

COUNTY OF

Charleston

## IN THE COURT OF COMMON PLEAS

## CIVIL ACTION COVERSHEET

2019-CP-1015506

FILED  
CLERK OF COURT  
2019 MAR 7 AM 10:13  
FILED

Plaintiff(s)

vs.

Defendant(s)

Submitted By:

Address:

SC G Petratz Plaza LP  
1670-91 Springdale Dr  
Camden, SC 29020

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

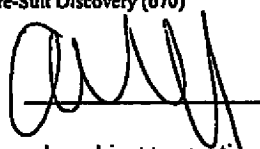
NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

## DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- ☐ JURY TRIAL demanded in complaint. ☒ NON-JURY TRIAL demanded in complaint.  
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☒ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.  
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

## NATURE OF ACTION (Check One Box Below)

- |   |  |   |  |
|---|--|---|--|
| <b>Contracts</b><br><input type="checkbox"/> Constructions (100)<br><input type="checkbox"/> Debt Collection (110)<br><input type="checkbox"/> General (130)<br><input type="checkbox"/> Breach of Contract (140)<br><input type="checkbox"/> Fraud/Bad Faith (150)<br><input type="checkbox"/> Failure to Deliver/Warranty (160)<br><input type="checkbox"/> Employment Discrim (170)<br><input type="checkbox"/> Employment (180)<br><input type="checkbox"/> Other (199)<br><b>Inmate Petitions</b><br><input type="checkbox"/> PCR (500)<br><input type="checkbox"/> Mandamus (520)<br><input type="checkbox"/> Habeas Corpus (530)<br><input type="checkbox"/> Other (599) | <b>Torts - Professional Malpractice</b><br><input type="checkbox"/> Dental Malpractice (200)<br><input type="checkbox"/> Legal Malpractice (210)<br><input type="checkbox"/> Medical Malpractice (220)<br>Previous Notice of Intent Case #<br>20 -NI-<br><input type="checkbox"/> Notice/ File Med Mal (230)<br><input type="checkbox"/> Other (299)<br><b>Administrative Law/Relief</b><br><input type="checkbox"/> Reinstate Drv. License (800)<br><input type="checkbox"/> Judicial Review (810)<br><input type="checkbox"/> Relief (820)<br><input type="checkbox"/> Permanent Injunction (830)<br><input type="checkbox"/> Forfeiture-Petition (840)<br><input type="checkbox"/> Forfeiture-Consent Order (850)<br><input type="checkbox"/> Other (899) | <b>Torts - Personal Injury</b><br><input type="checkbox"/> Conversion (310)<br><input type="checkbox"/> Motor Vehicle Accident (320)<br><input type="checkbox"/> Premises Liability (330)<br><input type="checkbox"/> Products Liability (340)<br><input type="checkbox"/> Personal Injury (350)<br><input type="checkbox"/> Wrongful Death (360)<br><input type="checkbox"/> Assault/Battery (370)<br><input type="checkbox"/> Slander/Libel (380)<br><input type="checkbox"/> Other (399)<br><b>Judgments/Settlements</b><br><input type="checkbox"/> Death Settlement (700)<br><input type="checkbox"/> Foreign Judgment (710)<br><input type="checkbox"/> Magistrate's Judgment (720)<br><input type="checkbox"/> Minor Settlement (730)<br><input type="checkbox"/> Transcript Judgment (740)<br><input type="checkbox"/> Lis Pendens (750)<br><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)<br><input type="checkbox"/> Confession of Judgment (770)<br><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)<br><input type="checkbox"/> Incapacitated Adult Settlement (790)<br><input type="checkbox"/> Other (799) | <b>Real Property</b><br><input type="checkbox"/> Claim & Delivery (400)<br><input type="checkbox"/> Condemnation (410)<br><input type="checkbox"/> Foreclosure (420)<br><input type="checkbox"/> Mechanic's Lien (430)<br><input type="checkbox"/> Partition (440)<br><input type="checkbox"/> Possession (450)<br><input checked="" type="checkbox"/> Building Code Violation (460)<br><input type="checkbox"/> Other (499)<br><b>Appeals</b><br><input type="checkbox"/> Arbitration (900)<br><input type="checkbox"/> Magistrate-Civil (910)<br><input type="checkbox"/> Magistrate-Criminal (920)<br><input type="checkbox"/> Municipal (930)<br><input type="checkbox"/> Probate Court (940)<br><input type="checkbox"/> SCDOT (950)<br><input type="checkbox"/> Worker's Comp (960)<br><input type="checkbox"/> Zoning Board (970)<br><input type="checkbox"/> Public Service Comm. (990)<br><input type="checkbox"/> Employment Security Comm (991)<br><input type="checkbox"/> Other (999) |
|---|--|---|--|
- Special/Complex /Other**  
☐ Environmental (600) ☐ Pharmaceuticals (630)  
☐ Automobile Arb. (610) ☐ Unfair Trade Practices (640)  
☐ Medical (620) ☐ Out-of-State Depositions (650)  
☐ Other (699) ☐ Motion to Quash Subpoena in an Out-of-County Action (660)  
☐ Sexual Predator (510) ☐ Pre-Suit Discovery (670)  
☐ Permanent Restraining Order (680)  
☐ Interpleader (690)
- Submitting Party Signature: 
- Date: 3/21/19

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCF, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.